



**WALSH GALLEGOS**  
TREVINO KYLE & ROBINSON P.C.

October 19, 2021

The Honorable Lee Rosenthal  
United States District Court  
Southern District of Texas  
515 Rusk St.  
Houston, TX 77002

*via ECF*  
& *via E-mail at* [Lisa Eddins@txs.uscourts.gov](mailto:Lisa.Eddins@txs.uscourts.gov)

**RE: Cause No. 4:21-cv-01547; Brandi Bryant and Jeremy Bryant a/n/f and on behalf of G.L. v. Dayton Independent School District, Dr. Jessica Johnson, and Geoff McCracken; In the United States District Court for the Southern District of Texas, Houston Division**

To the Honorable Judge Rosenthal:

Please allow this letter to serve as a formal request for a pre-motion conference concerning Defendant Dayton Independent School District's ("Dayton ISD" or "the District") desire to conduct in-person depositions of Plaintiff Brandi Bryant and Plaintiff G.L. In support of its request, the District would show the Court the following:

1. In order to adequately defend this case, Dayton ISD seeks to depose Plaintiff Brandi Bryant and Plaintiff G.L. in person with appropriate COVID-19 safety measures in place.
2. Counsel for Plaintiffs has advised that Plaintiffs will participate in Zoom depositions only.
3. Counsel for Plaintiffs and Counsel for Dayton ISD have conferred about this issue and have been unable to resolve the matter.

Because the parties have been unable to resolve the issue of the necessity for Plaintiffs to be deposed in person, Dayton ISD seeks the intervention of this Court to resolve the matter.

Respectfully submitted,

/s/ Morgan P. Beam

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

On October 18, 2021, counsel for Defendant Dayton Independent School District, Morgan Beam, conferred with counsel for Plaintiffs George Edwards III and Christine D. Herron via e-mail. Plaintiffs are opposed to the relief sought in Defendant's Motion to Compel.

/s/ Morgan P. Beam  
MORGAN P. BEAM

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon counsel for Plaintiffs on October 19, 2021.

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***via ECF***

/s/ Morgan P. Beam  
MORGAN P. BEAM